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Via ECF

July 13, 2022

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570
(GBD) (SN) – U.S. Victims of State Sponsored Terrorism Update

Dear Judge Daniels and Magistrate Judge Netburn:

I write today on behalf of plaintiffs in the above-captioned case to provide the Court with an update regarding the U.S. Department of Justice-administered United States Victims of State Sponsored Terrorism (“USVSST”) Fund. As the Court is aware, judgments obtained against designated state sponsors of terrorism are eligible for submission as claims for limited compensation from the USVSST Fund. The USVSST Fund recently publicized on its website (www.usvsst.com), “[i]f the USVSST Fund determines that sufficient funds are available to authorize a distribution by January 1, 2023, the application deadline for new claimants to be considered for fourth-round payments will be August 1, 2022.”

Given the USVSST Fund’s statement on its website regarding an application deadline for new claimants, plaintiffs seek the entry of default judgments in the following pending motions to allow them to proceed with claims in the Fund in advance of the publicized deadline:

1. The motion for partial final judgment against the Islamic Republic of Iran (“Iran”) filed on January 7, 2022 (ECF No. 7571);
2. The functional equivalent motion for partial final judgment against Iran filed on January 13, 2022 (ECF No. 7589);
3. The motion for partial final judgment against Iran filed on June 16, 2022 (ECF No. 8112); and,
4. The motion for partial final judgment against Iran, filed June 30, 2022 (ECF No. 8164).

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In addition, undersigned counsel intends to file shortly a motion for partial final judgment against Iran for non-citizen plaintiffs based on arguments developed jointly by Anderson Kill P.C. and Motley Rice LLC. Moreover, undersigned counsel was just informed that the recently filed lawsuit *Nicole Amato et al. v. Islamic Republic of Iran*, No. 1:21-cv-10239 was served by the U.S. State Department on Iran on June 15, 2022. Therefore, the earliest possible time to move for a judgment for plaintiffs in that case is mid-August, which is our intent.¹ In anticipation of the USVSST Fund's August 1, 2022 deadline for the submission of new applications for inclusion in the next round of distributions from the Fund, and being ever mindful of the Court's schedule and obligations, I write today to address any questions or concerns the Court may have regarding these submissions.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

cc: All MDL Counsel of Record (via ECF)

¹ We also anticipate shortly refiling our prior Taliban Judgment Motion, seeking to extend the prior liability determination to encompass all *O'Neill* plaintiffs, and partial final judgments for damages on behalf of all those *O'Neill* plaintiffs who presently possess damage judgments as to Iran, revised in accordance with the Court's recent guidance, ECF No. 8198. Thereafter, we intend to file several additional Taliban Damage Judgment Motions in the coming weeks, on behalf of those plaintiffs with *pending* judgment motions against Iran (see above), followed by those who have not yet been able to file damage judgment motions against Iran (generally as a result of delays in service).